UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA) No. 17 CR 635
)
v.) Violations: Title 18, United States
) Code, Sections 1591, 2251, 2421
BLAKE STECKEL)

COUNT ONE

The SPECIAL DECEMBER 2016 GRAND JURY charges:

Beginning no later than on or about July 25, 2017, and continuing until on or about August 21, 2017, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere,

BLAKE STECKEL,

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, namely, Victim A, having had a reasonable opportunity to observe Victim A, and knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim A to engage in a commercial sex act; and (2) that Victim A had attained the age of 14 years but had not yet attained the age of 18 years and would be caused to engage in a commercial sex act;

All in violation of Title 18, United States Code, Section 1591(a), (b)(1), and (b)(2).

COUNT TWO

The SPECIAL DECEMBER 2016 GRAND JURY further charges:

On or about July 29, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BLAKE STECKEL,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely, Victim A, to engage in sexually explicit conduct, namely, simulated sexual intercourse and lascivious exhibition of the minor's pubic area, for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce; and which visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer; and which visual depiction was actually transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

The SPECIAL DECEMBER 2016 GRAND JURY further charges:

On or about August 17, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BLAKE STECKEL,

defendant herein, knowingly transported any individual, namely, Victim A, in interstate and foreign commerce, with the intent that Victim A engage in prostitution, and in any sexual activity for which a person can be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2421.

FORFEITURE ALLEGATION

The SPECIAL DECEMBER 2016 GRAND JURY further charges:

- 1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251 as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18 United States Code, Sections 2251; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).
- 2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1591 as set forth in this Indictment, defendant shall forfeit to the United States of America any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property, as provided by Title 18, United States Code, Section 1594(d)(1) and (e)(1); any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property, as provided by Title 18, United States Code, Section 1594(d)(2) and (e)(2).
- 3. The property to be forfeited includes, but is not limited to, the following specific property:

- a. An HausBell Video Camera, bearing Serial Number 302S170400458;
- b. An Apple iPhone, Model A1662, bearing serial number DX3SK96XH2XL.
- 4. If any of the property described above, as a result of any act or omission by the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code, Section 853(p).

	A TRUE BILL:	
	FOREPERSON	
ACTING LINITED STATES ATTORNEY		